ESTTA Tracking number:

ESTTA604098 05/13/2014

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91205920	
Party	Defendant Sean Beckner and Front Flip, LLC	
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Submission	Stipulated/Consent Motion to Extend	
Filer's Name	Stephen J. Huggins	
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Signature	/stephen j huggins/	
Date	05/13/2014	
Attachments	91205920-unopposed motion to extend.pdf(93759 bytes)	

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of:

85/375,382
July 19, 2011
January 10, 2012
Sean Beckner

Mark: G+

GOOGLE INC.)
Opposer,)) Opposition No. 91205920
v.)
SEAN BECKNER and Front Flip, LLC,)))
Applicant.)
)

Trademark Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1451 Alexandria, Virginia 22313-1451

UNOPPOSED MOTION FOR EXTENSION OF DISCOVERY AND TRIAL PERIODS

The Close of Discovery is currently set for 06/10/2014. Applicant, Sean Beckner and Front Flip, LLC ("Beckner") requests that such date be extended for 14 days, or until 06/24/2014, and that all subsequent dates be reset accordingly. The grounds for this request are as follows: parties are unable to complete discovery/testimony during assigned period and are engaged in settlement discussions.

The parties intend to include in the extension the deadline for filing expert disclosures that passed on 5/12/2014, and thus request that this unopposed Motion be construed as a request

to re-open with respect thereto, if necessary. For the avoidance of doubt, the proposed new deadline for the parties to make expert disclosures is 5/26/14.

Beckner has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein. Beckner has provided an email address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Time to Answer: CLOSED

Deadline for Discovery Conference: CLOSED

Discovery Opens: CLOSED

Initial Disclosures Due: CLOSED

Expert Disclosures Due: 05/26/2014

Discovery Closes: 06/24/2014

Plaintiff's Pretrial Disclosures: 08/08/2014 Plaintiff's 30-day

Trial Period Ends: 09/22/2014 Defendant's Pretrial

Disclosures: 10/07/2014 Defendant's 30-day Trial Period Ends:

11/21/2014 Plaintiff's Rebuttal Disclosures: 12/08/2014

Plaintiff's 15-day Rebuttal Period Ends: 01/05/2015

Dated: May 13, 2014 Respectfully submitted,

> /s/ Stephen J. Huggins Stephen J. Huggins, Esq.

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Counsel for Applicant Sean Beckner and

Front Flip, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the UNOPPOSED MOTION FOR

EXTENSION OF DISCOVERY AND TRIAL PERIODS was served on the Opposer's counsel of record on May 13, 2014 via email and U.S. Mail:

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I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is true and correct.

/s/ Stephen J. Huggins Stephen J. Huggins, Esq.